Message

From: Meadows, Sarah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CD0A1144A9164FA99ADCA52F94CA199A-MEADOWS, SA]
Sent: 6/8/2020 5:07:37 PM
To: Thomas Orr [thomas.orr@bayer.com]
CC: Schmid, Emily [Schmid.Emily@epa.gov]; Steven Callen [steven.callen@bayer.com]
Subject: RE: XtendiMax (524-617)

Thanks for the update, Tom. I shared this with the EFED team. They're in agreement with the plan to begin a new study as outlined in your email below. The team would like to see the data from the first run, and request that a brief report be submitted along with the repeat study. Please also include your/Bayer's thoughts on what caused the contamination.

Thanks,

Sarah

From: Thomas Orr <thomas.orr@bayer.com>
Sent: Thursday, June 04, 2020 1:46 PM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>; Steven Callen <steven.callen@bayer.com>
Subject: XtendiMax (524-617)

Hi Sarah. I hope you are doing well. Please see below for an update on the ongoing oak tree study that is being conducted as part of the Conditions of Registration of the XtendiMax (524-617) registration. We are happy to discuss these results further with EPA if desired.

As part of the 2018 XtendiMax conditions of registration, EPA requested additional studies to evaluate ecological effects of dicamba exposure to non-target plants, related to survival and growth of select sensitive tree/shrub/woody perennial species. The initial tier 1 screening study was conducted on five tree species—sycamore (Platanus acerifolia), apple (Malus domestica), cherry (Prunus avium), swamp cypress (Taxodium distichum) and red oak (Quercus rubra)—to evaluate the effect dicamba exposure on growth, plant development and morphology.

The results of the tier 1 tree study confirmed that four tree species—sycamore, apple, cherry and swamp cypress—are less sensitive to dicamba than soybean (effects <25%) after exposure to dicamba at a rate of 0.000513 lb a.e./A under greenhouse conditions. For red oak, effects in the screening tier I study exceeded the 25% effect triggering a tier 2 study.

The dose-response tier 2 study was initiated April 2020. At the 14-d evaluation period, the control plants exhibited no phytotoxic symptoms; however, at the 28-d assessment some phytotoxicity was noted in the control trees (11 out of 20 replicates) with the observed symptomology including abnormal leaf development, chlorosis and necrosis. At the 45-d assessment, symptomology in the affected trees from the control group at 28 DAT increased slightly but no additional trees displayed symptomology. Due to the prevalence of the phytotoxicity in the water control group, the study is not considered valid and will require a repeat. Bayer has already begun acclimating new seedlings to greenhouse and the repeat study is expected to start in June.

Best regards,

Tom Orr
Broad Acre & Trait Use Lead
Crop Protection Regulatory Affairs

Bayer Crop Science
Monsanto Company
Regulatory Science
Building FF
Chesterfield, 63017, USA
Tel: +1 636-737-9347
Cell: +1 314-648-9653
E-mail: thomas.orr@bayer.com
Web: http://www.bayer.com

/// Follow Bayer on:
/// Twitter /// Facebook /// Instagram /// LinkedIn /// YouTube